

United States Courts  
Southern District of Texas  
FILED  
*AB*  
*EG*UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXASOCT 19 2023  
Nathan Ochsner, Clerk  
Laredo Division

LAWRENCE (LARRY) W. SINCLAIR )  
c/o 1520 Sherman Street )  
Laredo, Texas 78040 )  
Plaintiff, Pro Se ) Civil Action No. 5:23-CV-109  
VS ) AMENDED COMPLAINT  
) AND JURY DEMAND  
BRIAN MARK KRASSENSTEIN )  
15128 Anchorage Way )  
Fort Meyers, Florida 33908; )  
EDWARD LAWRENCE KRASSENSTEIN )  
15251 Intracoastal Ct )  
Fort Meyers, Florida 33908; )  
E&B ADVERTISING INC )  
15128 Anchorage Way )  
Fort Meyers, Florida 33908; )  
FORUM ADVERTISING LLC )  
15128 Anchorage Way )  
Fort Meyers, Florida 33908,  
Defendants. )

1 Plaintiff Lawrence (Larry) W. Sinclair, Pro Se files this complaint against  
2 defendants Brian Mark Krassenstein, Edward Lawrence Krassenstein, E&B Advertising  
3 Inc., and Forum Advertising LLC (collectively referred to as "defendants"), and alleges  
4 as follows:

5 **PARTIES**  
6

7 1. Plaintiff, Lawrence (Larry) W. Sinclair, is a citizen of Texas.  
8  
9 2. Defendant, Brian Mark Krassenstein, is a citizen of Florida.  
10  
11 3. Defendant Edward Lawrence Krassenstein is a citizen of Florida.  
12  
13 4. Defendant E&B Advertising Inc. is a Florida Corporation with its principal  
14 place of business in Fort Meyers, Florida.  
15  
16 5. Defendant Forum Advertising LLC is a Florida LLC with its principal place of  
17 business in Fort Meyers Florida. Forum has Two members: Brian Mark  
18 Krassenstein and Edward Lawrence Krassenstein establishing defendant  
19 Forum Advertising LLC citizenship of Florida. **EXHIBIT A 3-pages**

20 **JURISDICTION AND VENUE**  
21

22 6. Subject matter jurisdiction exists pursuant to 28 U.S.C. § 1332, 28 U.S.C. §  
23 1337; 28 U.S.C. § 1332(a)(1), in that plaintiff and defendants are citizens of  
24 different states and the matter in dispute exceeds to sum or value of \$75,000,  
25 exclusive of interest or costs.  
26  
27 7. Personal jurisdiction over the defendants is proper in this District. Defendants  
28 have continuous and systemic contacts with the Southern District of Texas  
29 and have been and are conducting and doing business within the district.

**BACKGROUND**

30  
31       8. Plaintiff is a private citizen who is a citizen of the state of Texas and is a  
32                   disabled 62-year-old.  
33       9. Plaintiff did in 2008 make allegations in the US Presidential election regarding  
34                   then candidate Barack Obama which resulted in massive amount of false and  
35                   libelous claims and statements to be published online by individuals as well  
36                   as some media outlets directed toward discrediting plaintiffs' statements.  
37       10. Plaintiff has over the past 15 plus years privately secured multiple FOIA  
38                   requests documents and investigations documenting the falsification of official  
39                   government records as well as continuous harassment.  
40       11. Plaintiff was contacted in July 2023 by representatives for Journalists Tucker  
41                   Carlson asking if plaintiff would agree to an interview regarding the 2008  
42                   attacks and how plaintiff was affected by the attacks.  
43       12. Plaintiff agreed to the interview request with full expectation that once the  
44                   interview aired, it would result in a flood of republication of a great amount of  
45                   the libelous false statements and claims previously published by others.  
46       13. Plaintiff had already known that the false libelous claims and statements  
47                   previously published had been shown to be untrue since 2012 and had  
48                   prepared to address any renewed publication of libel by simply contacting  
49                   those publishing it asking them to retract, admit they published information  
50                   they took from google search without verifying its truthfulness and apologize  
51                   for doing so.

52 14. Plaintiff additionally provided documentation demonstrating the truth vs the  
53 libel.

54 15. On August 30, 2023, Tucker Carlson appeared on an online Podcast of Adam  
55 Carolla where Carlson discusses media and the press dependence on  
56 government and how it affects what and how media reports stories.

57 16. In the appearance on Carolla's podcast Carlson referenced how the media  
58 reacted to Plaintiff in 2008 and mentioned specifically how one reporter  
59 published material and claims about plaintiff solely to try and discredit plaintiff.  
60 Carlson stated he had interviewed the plaintiff.

61 17. As expected by plaintiff Carlson's August 30, 2023 statements in online  
62 podcast began to open the damn of republication of libelous claims and  
63 statements both by legacy media outlets like the Daily Mail UK as well as by  
64 individuals claiming to be Journalists using social media platforms such as X  
65 (Formerly known as Twitter), Substack, YouTube et al. where they generate  
66 income via subscriptions, advertising revenue sharing and direct  
67 tips/donations from followers and subscribers.

68 18. On September 5, 2023, Journalist Tucker Carlson released a one minute four  
69 second promotional clip of his interview with plaintiff on X (formerly known as  
70 Twitter) which reached more than 76 million viewers. Upon the release of that  
71 promo clip defendants Brian Krassenstein and Edward Krassenstein began  
72 publishing on X in response to said clip libelous, false claims and statements  
73 about plaintiff which they obtained by simply Googling plaintiff's name.

74 19. On September 6, 2023, Tucker Carlson aired the entire video interview with  
75 plaintiff on X (formerly known as Twitter) at 6PM Eastern Time.

76 20. Defendants Brian Krassenstein and Edward Krassenstein upon the airing on  
77 September 6, 2023, of full interview began publishing more libel false claims  
78 and statements about plaintiff.

79 21. Plaintiff immediately responded to both defendants informing them their posts  
80 were libelous, false and that their republishing someone else's libel did not  
81 make them immune from legal action. Plaintiff specifically requested both  
82 plaintiffs retract the published statements, admit they published other people's  
83 libel without first verifying its truthfulness and apologize.

84 22. Both defendants Brian and Edward Krassenstein refused and even tried to  
85 use their publication of libel to pressure plaintiff into appearing on their online  
86 an X platform programs so they could profit from the trending interest in the  
87 interview by benefit of the number of listeners they could draw.

88 23. Plaintiff gave defendants multiple opportunities to retract their repeated libel  
89 and false claims and apologize and resolve this issue without having to  
90 engage in litigation. Defendant Edward Krassenstein chose to simply ignore  
91 plaintiffs repeated requests and offers while defendant Brian Krassenstein  
92 chose to inform plaintiff on September 18, 2023, via a direct message on X at  
93 5:12am:

94 a. ***“Even better come on my show and we can discuss. I posted  
what was in the public realm for 15 years which you made no***

***effort to have removed in the past as far as I'm aware but I'll be happy to take a look and remove anything I find to be inaccurate."***

24. Despite Defendant Brian Krassenstein message on September 18, 2023, defendant had already been provided documentation his published claims were false and had he bothered to research he would have found they had been proven false for more than 10 years before he published them.

25. On September 25, 2023, at 6:29PM Defendant Brian Krassenstein published in a comment to plaintiff on X (formerly known as Twitter) the following statement:

**a. You can just fast forward your timer. I'm not giving into you attempt to get \$750k from me for posting material that has been online about you since 2008. I would love for you to stop defaming me though and doxxing my private information. I will actually contact a real attorney if it continues, and not just try to extort money off of you via email. Nice try though.**

26. Defendant Edward Krassenstein has been exposed via and undercover video recording of him admitting that defendant and defendant Brian Krassenstein are paid to "sew division" as part of "the resistance" and use their X (formerly known as Twitter) presence and their businesses which are listed herein as defendants E&B Advertising Inc and Forum Advertising LLC to publish and distribute content based on its clients requests in directing of political or social narratives.

118 27. Defendants Brian Krassenstein, Edward Krassenstein, E&B Advertising Inc,  
119 and Forum Advertising LLC repeatedly published false, knowingly untrue  
120 claims and statements represented as "facts" and "Proven facts" alleging  
121 plaintiff:

- a. Has a 27-year criminal history
- b. Has a history of convictions for fraud
- c. Failed two polygraph/lie detector tests.
- d. Has a history of making false statements
- e. Has a 27-year proven history of deception.

**COUNT I**  
*(Libel/Libel Per Se)*

136 28. The foregoing allegations of the complaint are incorporated herein by  
137 reference.

138 29. In or about September 2023 the defendants published the libelous  
139 defamatory statements on X (formerly known as Twitter)

140       30. The libelous defamatory statements referred to plaintiff by name or were  
141           published where they were clearly referring directly to plaintiff, were made of  
142           and concerning him, and were so understood by those reading the libelous  
143           defamatory statements.

144 31. The libelous defamatory statements are false and misleading as they refer to  
145 Plaintiff Sinclair.

146       32. The libelous defamatory statements were made and published by defendants  
147           with knowledge of their falsity and with reckless and total disregard for their  
148           truth.

149       33. Given the readily available documented truth the defendants libelous  
150           defamatory statements were so excessive, intemperate, unreasonable and  
151           abusive as to preclude any conclusion other than the defendants were  
152           actuated by actual malice.

153       34. The defamatory statements are libelous on their face, in that they expose  
154           Sinclair to hatred, contempt, ridicule and obloquy because they published  
155           states that *inter alia* Sinclair has a 27-year criminal history, history of  
156           convictions for fraud, 27 year history of deception proven, failed two  
157           polygraph tests etc.

158       35. The defamatory libelous statements have been made in a specific forum and  
159           are available to be read, seen, shared and redistributed by the public  
160           including without limitation citizens of the Southern District of Texas.

161       36. The defamatory libelous statements were not privileged and were published  
162           by the defendants with malice, hatred, contempt and ill will toward Sinclair  
163           with the desire to cause him economic, emotional, physical, injury including  
164           loss of financial support toward needed medical treatment.

165       37. As a direct and proximate result of the foregoing, Sinclair has suffered loss of  
166           reputation, extreme emotional duress, shame, interference with obtaining  
167           necessary medical treatment, physical injury, obloquy and loss of  
168           opportunities in an amount to proven at trial in excess of \$15,000.000.00

169           38. Because of defendants' intentional malice in publishing the defamatory and  
170           libelous statements, Sinclair is entitled to an award punitive and exemplary  
171           damages.

**COUNT II**  
***(False Light Invasion/Misappropriation of Privacy)***

176 39. The foregoing allegations of the complaint are incorporated herein by  
177 reference.

178 40. The published defamatory libelous statements concerning Sinclair place him  
179 in a false light which would be highly offensive to a reasonable person.

180 41. Defendants had knowledge of and acted in total reckless disregard for the  
181 falsity of their defamatory libelous statements and the false light in which  
182 Sinclair would be placed in.

183 42. Defendants have misappropriated Sinclair's' right to privacy.  
184

185 43. As a direct and proximate result of the foregoing, Sinclair has suffered  
186 damages in an amount to be proven at trial in excess of \$15,000.000.00.

187 44. Because of defendants' intentional malice in publishing the defamatory and  
188 libelous statements, Sinclair is entitled to an award punitive and exemplary  
189 damages.

**COUNT III**  
**(Tortious Interference)**

194 45. The foregoing allegations of the complaint are incorporated herein by  
195 reference.

196 46. At all relevant time Sinclair had an active Go Fund Me fundraising campaign  
197 in effect which was established in July 2023 for the purpose of raising funds  
198 to pay for needed medical treatment (specifically) surgery on his hands and  
199 arms due to years of nerve and disc damage, to prevent Sinclair total loss of  
200 use of both hands and arms.

201 47. Defendants had knowledge of such relationship, campaign or expectancy.

202 48. Defendants intentionally interfered with said relationship by publishing of their  
203 defamatory and libelous statements.

204 49. As a direct and proximate result of the foregoing, Sinclair has suffered  
205 damages in an amount to be proven at trial in excess of \$15,000.000.00.

206 50. Further, Defendants' tortious interference was with intent to injure and harm  
207 Sinclair so as to constitute oppression, fraud and malice justifying an award of  
208 exemplary and punitive damages in an amount to be determined at trial.

210 **COUNT IV**  
211 ***(Civil Conspiracy)***

212 51. The foregoing allegations of the complaint are incorporated herein by  
213 reference.

214 52. Defendants have combined and conspired for an unlawful purpose, i.e.,  
215 defamation, libel and tortious interference with intent to injure plaintiff.

216 53. Defendants have done one or more overt acts in furtherance of their  
217 conspiracy.

EXHIBIT A



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

## Detail by Entity Name

Florida Limited Liability Company

FORUM ADVERTISING LLC

### Filing Information

Document Number: L14000003100

FEI/EIN Number: 46-4513869

Date Filed: 01/07/2014

State: FL

Status: ACTIVE

### Principal Address

15128 Anchorage Way

Fort Myers, FL 33908

Changed: 03/02/2016

### Mailing Address

15128 Anchorage Way

Fort Myers, FL 33908

Changed: 03/02/2016

### Registered Agent Name & Address

KRASSENSTEIN, BRIAN

15128 Anchorage Way

Fort Myers, FL 33908

Address Changed: 03/02/2016

### Authorized Person(s) Detail

#### **Name & Address**

Title MGR

KRASSENSTEIN, BRIAN

15128 Anchorage Way

Fort Myers, FL 33908

Title MGR

KRASSENSTEIN, EDWARD  
15231 INTRACOASTAL CT  
FORT MYERS, FL 33908

**Annual Reports**

<b>Report Year</b>	<b>Filed Date</b>
2021	04/05/2021
2022	04/12/2022
2023	04/08/2023

**Document Images**

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<a href="#">01/07/2014 – Florida Limited Liability</a>	<a href="#">View image in PDF format</a>

**2023 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT**

DOCUMENT# L14000003100

**Entity Name:** FORUM ADVERTISING LLC

**Current Principal Place of Business:**

15128 ANCHORAGE WAY  
FORT MYERS, FL 33908

**Current Mailing Address:**

15128 ANCHORAGE WAY  
FORT MYERS, FL 33908 US

**FEI Number:** 46-4513869

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

KRASSENSTEIN, BRIAN  
15128 ANCHORAGE WAY  
FORT MYERS, FL 33908 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

Electronic Signature of Registered Agent

Date

**Authorized Person(s) Detail :**

Title	MGR	Title	MGR
Name	KRASSENSTEIN, BRIAN	Name	KRASSENSTEIN, EDWARD
Address	15128 ANCHORAGE WAY	Address	4921 SW 25TH PLACE
City-State-Zip:	FORT MYERS FL 33908	City-State-Zip:	CAPE CORAL FL 33914

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** EDWARD KRASSENSTEIN

MGR

04/08/2023

Electronic Signature of Signing Authorized Person(s) Detail

Date